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August 23, 2002

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AUG 29 2002

Federal Communications Commission
Office of Secretary

Federal Communications Commission
Washington, DC 20554

In the Matter of: WC Docket No. 02-215 (publication DA 02-2057)

Subject: Inability to Transfer Cellular Phone Service from WorldCom Wireless to Verizon/Cingular

To the Commission:

This Comment constitutes an official complaint regarding my inability to acquire "reasonable substitute service" from Verizon or Cingular for the analog cellular service currently provided by WorldCom Wireless.

Specifically, after a number of calls to both Verizon and Cingular, I was able to determine that neither company was willing to transfer my existing WorldCom Wireless analog phone service to their networks. This phone is permanently mounted in my car. And while both Verizon and Cingular still maintain analog networks for existing customers (and must, I believe, continue to provide this service for the next 5 years), they are refusing to provide "new" customers with this service.

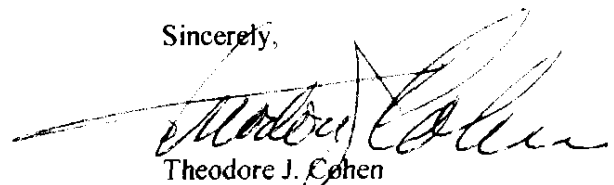
I don't understand how the Commission can allow the carriers in question to basically abandon analog customers. Currently, WorldCom Wireless provides analog service to my mobile phone under their SOLSAFE Access Plan. This plan has a base rate of \$14.99 per month, with Peak Hour/Non-Peak Hour charges of \$0.35/minute. I have had this service since the mid-1990s. Importantly, the service uses Verizon's network under agreements between WorldCom Wireless and Verizon. But Verizon has informed me that the lowest cost digital service they will offer me imposes a monthly fee of \$25; it allowed 45 minutes of calling before per-minute fees (\$0.50/minute) were applicable. Further, if I chose this plan, I could not keep the number I now have. Importantly, this "local" service was only available to me in Virginia, Maryland, D.C., and Delaware; roaming fees apply outside of these areas.

The next higher-cost digital plan from Verizon was priced at \$35/month. It allowed me to keep my existing telephone number and provided other incentives (i.e., a higher number of "free minutes"). This plan far exceeds any service I need, given the monthly call volume from the car.

The result is that either I must purchase an entirely new phone and digital service from Verizon (or Cingular) at 2 to 3 times the cost of my existing service or do without mobile service (save for 911 service (and I'm not even sure of that) in my vehicle because no carrier will provide me with analog service.

I protest most vigorously this abandonment of analog users, and seek redress from the Commission in this matter.

Sincerely,



Theodore J. Cohen

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